

## **Exhibit A**

**Exhibit A**

1 Michael I. Katz (CA State Bar No. 181728)  
2 Email: [mkatz@mabr.com](mailto:mkatz@mabr.com)  
3 L. Rex Sears (CA State Bar No. 294533)  
4 Email: [rsears@mabr.com](mailto:rsears@mabr.com)  
5 Jared J. Braithwaite (CA State Bar No. 288642)  
6 Email: [jbraithwaite@mabr.com](mailto:jbraithwaite@mabr.com)  
7 Erynn L. Embree (CA State Bar No. 312131)  
8 Email: [eembree@mabr.com](mailto:eembree@mabr.com)  
9 MASCHOFF BRENNAN  
10 100 Spectrum Center Drive, Suite 1200  
11 Irvine, California 92618  
12 Telephone: (949) 202-1900  
13 Facsimile: (949) 453-1104

14 Attorneys for Plaintiff and Counter-defendants

15 **UNITED STATES DISTRICT COURT**  
16 **CENTRAL DISTRICT OF CALIFORNIA**  
17 **SOUTHERN DIVISION**

18 SOFTKETEERS, INC. a California  
19 corporation,

20 Plaintiff,

21 v.

22 REGAL WEST CORPORATION d/b/a  
23 REGAL LOGISTICS, a Washington  
24 corporation; VU HO INC., THAI  
TRAN INC., and DON MAI INC.,  
California corporations; and RAND  
NEEVES, VU HO, THAI QUOC  
TRAN, DON MAI, TRUNG NGOC  
DOAN, AND DONG BAO PHAM  
individuals,

25 Defendants.

26 Case No. 8:19-cv-00519-JVS (JDEx)

27 **ORDER GRANTING STIPULATED**  
**MOTION FOR ALTERED SOURCE**  
**CODE REVIEW PROCEDURES IN**  
**LIGHT OF U.S. PANDEMIC RESPONSE**

28 **HON. JAMES V. SELNA**  
UNITED STATES DISTRICT JUDGE  
SANTA ANA, COURTROOM 10C

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AND RELATED COUNTERCLAIMS.

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Having considered the parties' Stipulated Motion for Altered Source Code Review Procedures in Light of U.S. Pandemic Response, the Court finds that good cause exists to grant the stipulated motion. Therefore, the Motion is hereby GRANTED, and the Court modifies Section 10 of the Protective Order to permit the parties to make source code available according to the following conditions:

1. Promptly upon confirmation of the Court's approval of these procedures, the  
2. parties will provide the source code that they have produced in this matter on a  
3. laptop shipped directly to the opposing parties' source code expert, which will  
4. be designated HIGHLY CONFIDENTIAL – SOURCE CODE under the  
5. Protective Order.
6. 2. The parties will further arrange with Integrity Legal Corp. for the source code  
7. that has been held in escrow to be delivered by electronic means to both source  
8. code experts for download to such laptops.
9. 3. The parties' experts may use whatever tools they believe necessary for their  
10. review of the source code.
11. 4. The parties' experts will be permitted to connect the provided laptops to the  
12. Internet for the limited purpose of installing and activating review tools used for  
13. the source code review, as well as for the receipt of additional source code from  
14. the Producing Party or as per Paragraph 2. The experts agree not to transmit the  
15. opposing parties' produced source code over the Internet or other network  
16. connections.
17. 5. The parties' experts shall not print, photograph, copy, remove or otherwise  
18. transfer any portion of the source code onto any recordable media or recordable  
19. device. The parties and their experts may request paper copies of limited  
20. portions of source code, in accordance with Section 10(c) of the Protective  
21. Order. Under Section 10(c) of the Protective Order the Producing Party will  
22. send by overnight courier the paper copies requested by the Requesting Party

1 and its expert within 2 business days of return of the laptop to the Producing  
2 Party.

3 6. The parties' experts will return the laptops to the producing parties upon  
4 completion of their review and are permitted to take steps to delete or purge  
5 evidence of their protected work product from the laptops before returning  
6 them. This stipulation does not alter the disclosure requirements under the  
7 Federal Rules of Civil Procedure for the Disclosure of Expert Testimony.  
8 7. The parties' experts will sign this stipulation indicating that they have read it  
9 and agree to be bound by its terms and the terms of the Protective Order.

10 **The Court thanks the parties for working cooperatively in these difficult  
11 times. JVS**

12  
13 Dated this 9th day of April, 2020  
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16 HON. JAMES V. SELNA  
17 United States District Court Judge  
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